

Lawrence D. Murray (SBN 77536)
MURRAY & ASSOCIATES
1781 Union Street
San Francisco, CA 94123
Tel:(415) 673-0555 Fax: (415) 928-4084
Attorneys For Plaintiffs

DENNIS J. HERRERA (SBN 139669)
City Attorney
ELIZABETH S. SALVESON (SBN 83788)
Chief Labor Attorney
MARGARET BAUMGARTNER (SBN 151762)
RAFAL OFIERSKI (SBN 194798)
Deputy City Attorneys
Fax Plaza
1390 Market Street, Fifth Floor
San Francisco, CA 94102
Tel: (415) 554-3800 Fax: (415) 554-4248
Attorneys For Defendant
CITY AND COUNTY OF SAN FRANCISCO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MERCY AMBAT *et al.*

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,

Defendant.

No. **Case No. C-07-3622 SI**
(including No: C-08-2406 SI & C-09-2652 SI)

**STIPULATION FOR ORDER AND ORDER
PERMITTING EXTENSION ON DATES FOR
COMMENCING DEPOSITIONS OF EXPERT
WITNESSES**

Plaintiffs and Defendant CITY AND COUNTY OF SAN FRANCISCO, by and through their respective attorneys of record, hereby stipulate and request the Court to further modify the Pre-Trial Scheduling Order by extending:

(a) All expert rebuttal reports, if any, shall be exchanged no later than December 18, 2010.

(b) All depositions of rebuttal experts, if any, shall be completed by January 8, 2010.

(c) All depositions of Plaintiffs' Experts regarding damages shall be completed by February 26, 2010.

(d) The deposition of Ric Fatone Zayas shall be completed the week of January 11, 2010.

Furthermore, the motions for summary judgment are scheduled to be filed no later than January 8, 2010, the opposition is due by January 22, 2010, the reply is due January 29, 2010, and hearing on the summary judgment no later than February 12, 2010. Jury trial in this case is currently scheduled for March 29, 2010. None of these dates need be changed.

Good cause exists to alter the completion dates for particular Expert Witnesses because the parties have been actively scheduling, calendaring, and completing depositions for expert witnesses' whose testimony is necessary for the filing of the parties' upcoming dispositive motions. Granting an extension for the completion of damage experts' depositions would save the unnecessary waste of the parties' time and resources.

For this reason, the parties respectfully request the Court modify the Pre-Trial Scheduling Order so that expert disclosure conforms to the foregoing new dates.

Date: December 15, 2009

MURRAY & ASSOCIATES

SAN FRANCISCO CITY ATTORNEY OFFICE

/s/Lawrence D. Murray
Lawrence D. Murray
Attorney for Plaintiffs

/s/Margaret W. Baumgartner
Margaret W. Baumgartner
Attorney for Defendant
City and County of San Francisco.

ORDER ON STIPULATION FOR ORDER

HAVING READ AND CONSIDERED THE FOREGOING, and good cause appearing:

The foregoing is the order of the court.

Date:

A handwritten signature in blue ink, reading "Susan Illston", is written over a horizontal line.

SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE